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7 **UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON**
9 **TACOMA DIVISION**

10 WILL CO. LTD. a limited liability company
organized under the laws of Japan,

11 Plaintiff,

12 vs.

13 KA YEUNG LEE, an individual; YOUHAHA
14 MARKETING AND PROMOTION LIMITED,
a foreign company; and DOES 1-20, d/b/a
15 THISAV.COM,

16 Defendants.
17

Case No.: 3:20-cv-05802-BHS

**DECLARATION OF SPENCER
FREEMAN IN SUPPORT OF
PLAINTIFF MG PREMIUM LTD'S *EX*
PARTE MOTION FOR LEAVE FOR
ALTERNATIVE SERVICE**

18 I, Spencer D. Freeman, declare:

19 1. I am an attorney at law licensed to practice before the Courts of the State of
20 Washington and the United States District Court Western District of Washington, Eastern
21 District of Washington, District of Colorado, Southern District of Illinois, Ninth Circuit Court of
22 Appeals, and United States Supreme Court. I am the principle attorney with the law firm of
23 Freeman Law Firm, Inc., attorneys for Will Co. Ltd. Unless otherwise stated, I have personal
24 knowledge of the facts contained herein this declaration and, if called and sworn as a witness,
25 could and would competently testify thereto.
26

DECLARATION OF S. FREEMAN ISO PLAINTIFF'S
MOTION FOR ALTERNATIVE SERVICE [NO. 3:20-
cv-05802-BHS]

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FREEMAN LAW FIRM, INC.

1107 ½ Tacoma Avenue South

Tacoma, WA 98042

(253) 383-4500 - (253) 383-4501 (fax)

1 2. On August 10, 2020, on behalf of Will Co, I filed this instant action regarding
2 copyright infringement occurring on the web site ThisAV.com.com.

3 3. On September 10, 2020, after attempting to determine the owners and operators
4 of the web sites, I filed a motion for leave to conduct early discovery in order to discover the
5 actual identity of the owners and/or operators of Avgle.com.

6 4. On September 28, 2020, the Court entered an Order Granting Plaintiff's Motion
7 for Early Discovery.

8 5. Pursuant to the Court's Order, I caused subpoenas to be served on GoDaddy,
9 LLC; Domains by Proxy, LLC; Tiger Media, Inc.; and Gorilla Servers, Inc.

10 6. GoDaddy, LLC provide(d) registrar services for ThisAV.com.

11 7. Defendants use Domains By Proxy as a privacy service to hide their identities.

12 8. Gorilla Servers, Inc. provides Defendants with web site hosting services for
13 ThisAV.com.

14 9. The ThisAV.com web site displays advertisements brokered through or on behalf
15 of Tiger Media, Inc.

16 10. In late October 2020, I received and reviewed documents produced by Tiger
17 Media in response to the subpoena. Therein, Tiger Media's records indicate that the account
18 holder for ads brokered on ThisAV.com is Youhaha Marketing and Promotion Limited with an
19 address of 7/F Kowloon Building, 555 Nathan Road, Hong Kong. An contact email for the
20 account is listed as youhahahk@gmail.com. .

21 11. In late October 2020, I received and reviewed documents produced by Gorilla
22 Servers, Inc. in response to the subpoena. Gorilla Servers's records show Ka Yeung Lee and
23 the company Youhaha Marketing and Promotion Limited as the account holders, administrative
24 contact, payor, and responsible party for the account specific to ThisAV.com. The records have
25 an address of Flat 701, Kowloon Building, 555 Nathan Road, Kowloon, Hong Kong, and email
26 addresses of panda4uhk@gmail.com and tech@zenex5ive.com

DECLARATION OF S. FREEMAN ISO PLAINTIFF'S
MOTION FOR ALTERNATIVE SERVICE [NO. 3:20-
cv-05802-BHS]

1 I declare under the penalty of perjury under the laws of the United States of America that
2 the foregoing is true and correct.

3 Execute on the 10th day of December, 2020 at Tacoma, Washington.

4 /s/ Spencer D. Freeman

5 Spencer D. Freeman
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MOTION FOR ALTERNATIVE SERVICE [NO. 3:20-
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